

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

PARKER PELHAM, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

VBIT TECHNOLOGIES CORP., VBIT MINING LLC,  
ADVANCED MINING GROUP, DANH CONG VO  
A/K/A DON VO, PHUONG D VO A/K/A KATIE VO,  
SEAN TU, JIN GAO, LILLIAN ZHAO, AND JOHN  
DOE INDIVIDUALS 1-10, AND DOE COMPANIES  
1-10,

Defendants.

C.A. No.: 23-cv-162-CFC-SRF

CLASS ACTION

**NOTICE OF MOTION OF ALISHA MCKELLAR TO APPOINT LEAD PLAINTIFF  
AND APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL**

**PLEASE TAKE NOTICE** that pursuant to Section 27 of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3)(B), Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), movant Alisha McKellar a/k/a Alisha Lee ("Movant"), hereby moves the Honorable Colm F. Connolly, Chief Judge of the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Unit 31, Room 4124, Wilmington, DE 19801, for an order appointing Movant to serve as Lead Plaintiff in this action and approving her selection of The Rosen Law Firm, P.A. as Lead Counsel and Farnan LLP as Liaison Counsel for the litigation and all subsequently filed related litigations.

In support of this Motion, Movant submits: (1) the Declaration of Brian E. Farnan dated April 17, 2023 (with exhibits); (2) a Memorandum of Law in support of Motion dated April 17, 2023; and (3) a [Proposed] Order.

Dated: April 17, 2023

Respectfully submitted,

**FARNAN LLP**

/s/ Brian E. Farnan

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*[Proposed] Liaison Counsel for  
Plaintiffs and the Class*

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*[Proposed] Lead Counsel for Plaintiff and the  
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